

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

**JANE DOE 1, JANE DOE 2,  
and JANE DOE 3,**

Plaintiff,

vs.

Case No. 23-CV-01059 GBW/KRS

**NEW MEXICO STATE UNIVERSITY,  
NEW MEXICO STATE UNIVERSITY BOARD OF REGENTS,  
JOSEPH BERNING, CAROLE CARSON,  
ROBERT WOOD, PHILLIP POST,  
MICHAEL MOREHEAD, LAURA CASTILLE,  
HENRIETTA PICHON, YOSHITA IWASAKI,  
GERARD NEVAREZ, DON POPE-DAVIS,  
SUSAN BROWN and JOHN DOES 1 through 5,**

Defendants.

**UNOPPOSED MOTION FOR ENTRY OF  
STIPULATED CONFIDENTIALITY ORDER**

Defendants, New Mexico State University (*hereinafter* “NMSU”), New Mexico State University Board of Regents (*hereinafter* “NMSUBOR”), and the individual defendants, all in in their capacity as NMSU employees, Joseph Berning, Carole Carson, Robert Wood, Phillip Post, Michael Morehead, Laura Castille, Henrietta Pichon, Yoshitaka Iwasaki, Gerard Nevarez, Don Pope-Davis, and Susan Brown (*hereinafter referred to collectively as* “NMSU Defendants”), through their attorneys, Robles, Rael, & Anaya, P.C. (Luis Robles and Samuel C. DeFillippo) pursuant to Fed. R. Civ. P. 26(c), state the following for their Unopposed Motion for Entry of Stipulated Confidentiality Order:

1. Both NMSU Defendants and Plaintiffs are in possession of confidential documents

and other materials pursuant to state and federal laws, regulations and policies, including employment records, educational records, medical and mental healthcare records and records relating to other employees and students who may be witnesses in this matter. Such materials are or may be subject to discovery and disclosure in this case.

2. Pursuant to Fed. R. Civ. P. 26(c), NMSU Defendants request that this Court enter a Stipulated Confidentiality Order to protect certain confidential materials from public disclosure.

3. Counsel for Plaintiffs has been contacted and does not oppose this motion.

**WHEREFORE**, NMSU Defendants respectfully request that this Court enter a Stipulated Confidentiality Order in this case and award any other relief this Court deems just and proper.

Respectfully submitted by:

**ROBLES, RAEL & ANAYA, P.C.**

By: /s/ Samuel C. DeFillippo  
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I hereby certify that on this 22<sup>nd</sup> day of July, 2024 the foregoing was served via the CM/ECF system to the following:

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/s/ Samuel C. DeFillippo  
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